



William Osler  
Health System

William Osler Health System (Osler)  
Multi-year Accessibility Plan, 2019-2024

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## **Message from the Co-Chairs of the Osler Accessibility Advisory Committee**

William Osler Health System (Osler) is committed to improving accessibility and inclusion by removing barriers for people with both visible and “invisible” disabilities. This Multi-year Accessibility Plan has been reviewed and approved by members of the Osler Accessibility Advisory Committee (AAC).

This Plan will help Osler comply with Ontario’s accessibility laws and meet our accessibility policy commitments. The Plan will also provide a roadmap for Osler staff and the AAC to work towards transforming Osler into a more accessible and inclusive organization, aligning with the Government of Ontario’s goal of an accessible Ontario by 2025.

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Co-Chairs, Osler Accessibility Advisory Committee

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## Background

In 2005, the Government of Ontario passed the *Accessibility for Ontarians with Disabilities Act (AODA)*, with the goal of an accessible Ontario by 2025. The purpose of the AODA is to develop, implement and enforce standards for accessibility for Ontario employers, related to ensuring that goods, services, facilities, employment, accommodation and buildings are accessible and inclusive.

This Multi-year Accessibility Plan (2019-2024) has been developed with the purpose of providing William Osler Health System (Osler) with a guide to achieving accessibility and inclusion. This Plan was developed with information and priorities based on numerous resources. Resources included the previous Osler Multi-year Accessibility Plan (2013-2018) and other Osler accessibility policies and procedures. Feedback and reviews were provided by members of the Osler Accessibility Advisory Committee (AAC). The AAC consists of Osler health care administrators, patient and family representatives, and members of the broader community served by Osler.

The Government of Ontario's *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* outlines requirements and regulations pertaining to various Standards, including Customer Service, Information and Communications, Employment, Design of Public Spaces, and Transportation. In addition to Osler's commitment to meeting AODA compliance requirements, Osler is also committed to increasing accessibility and inclusion beyond AODA compliance requirements. In this Multi-year Plan, Osler has documented both its accessibility achievements to date as well as current and future goals for improving accessibility to its services, facilities, and employment opportunities.

Accessibility goals are included because they are either mandatory AODA requirements or identified by Osler as accessibility goals based on prioritized needs and gaps identified by the AAC, with input from a number of sources. Sources providing input include earlier (2012-13) Osler Visioning Sessions, facility accessibility audits performed by Sterling Frazer Associates, consultations and review of accessibility policies and procedures with AIM for Inclusion, and staff and patient feedback provided to Osler.

The Plan includes a communication strategy for the purposes of sharing information about Osler accessibility goals. The communication strategy addresses the priority of actively communicating details of the Plan to both internal and external audiences. It is a priority to ensure that information is available and communicated in alternate formats, including the use of electronic, Braille, print media, presentations and word-of-mouth to convey relevant information and to increase awareness about accessibility features at Osler as much as possible.

## Introduction

The AODA mandates that public sector organizations establish, implement, maintain and document a multi-year accessibility plan that outlines the organization's strategy to identify, remove, and prevent barriers and meet its requirements under the AODA. The Osler Multi-year Accessibility Plan is reviewed and approved by members of the Osler Accessibility Advisory Committee (AAC).

Osler recognizes that disabilities themselves are not considered barriers. A barrier is anything that prevents a person with disability from fully participating in all aspects of society because of their disability.

Most barriers are not intentional, but often develop because the needs of people with disabilities are not considered at the design stage, when creating a policy or procedure, providing a service, or designing a product or facility. Osler is committed to identifying, removing, and preventing barriers of all types, whether visible or "invisible."

### *Attitudinal*

Attitudinal barriers may result in people with disabilities being treated differently than people without disabilities.

### *Information and communication*

Informational and communication barriers arise when a person with a disability cannot easily receive or understand information that is available to others.

### *Systemic*

Systemic barriers in policies, practices and procedures result in people with disabilities to being treated differently than others or sometimes excluded altogether.

### *Physical and architectural*

Physical and architectural barriers occurs in the environment and prevent access for people with disabilities.

### *Technological*

Technological barriers occur when technology or the way it is used does not meet the needs of people with disabilities.

## **Osler Statement of Commitment to Accessibility**

William Osler Health System (Osler) is committed to providing an accessible and inclusive environment for all patients, staff, family members, and others who work, volunteer, or partner with us. Osler is committed to ensuring equal access and participation for people with disabilities and to treating people with disabilities in a way that allows them to maintain their dignity and independence. Osler strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities and to ensuring equal access and participation for all.

## AODA Compliance Achievements

William Osler Health System (Osler) is committed to meeting all AODA compliance requirements and deadlines, including filing accessibility compliance reports and status updates.

AODA Requirement	Implementation Deadline	Osler Compliance Status
<ul style="list-style-type: none"> <li>• Provide accessible customer service and provide customer service training for staff and volunteers to serve customers of all abilities and keep a written record of training</li> <li>• Create accessible ways for people to provide feedback</li> </ul>	January 1, 2010	Compliant
<ul style="list-style-type: none"> <li>• Provide accessible transportation services</li> </ul>	July 1, 2011	Not Applicable – Osler does not manage or provide transportation services
<ul style="list-style-type: none"> <li>• Provide accessible emergency and public safety information</li> <li>• Provide accessible emergency information to staff</li> </ul>	January 1, 2012	Compliant
<ul style="list-style-type: none"> <li>• Create an accessibility policy and make the policy public</li> <li>• Create a multi-year accessibility plan to help Osler achieve its accessibility goals and make the plan public</li> <li>• Buy goods, services or facilities that are accessible to people with disabilities – where possible accessibility design, criteria and features are included in bid requirement documents and other methods of purchasing new goods, services or facilities for Osler</li> <li>• Include accessibility features when purchasing or designing self-service kiosks – including any interactive electronic terminals that people use to pay parking fees, validate tickets, or access information</li> </ul>	January 1, 2013	Compliant

AODA Requirement	Implementation Deadline	Osler Compliance Status
<ul style="list-style-type: none"> <li>• Make it easy for people with disabilities to provide feedback</li> <li>• Train all employees and volunteers on accessibility requirements that apply to their job duties and Osler policies and procedures</li> <li>• Ensure new websites or old websites being significantly updated are accessible</li> <li>• Make employment practices accessible, including how Osler hires, retains, and provides career development opportunities</li> <li>• Document processes for developing individual accommodation plans and return-to-work plans</li> </ul>	January 1, 2014	Compliant
<ul style="list-style-type: none"> <li>• Make public information accessible when requested</li> </ul>	January 1, 2015	Compliant
<ul style="list-style-type: none"> <li>• Make new or redeveloped public spaces accessible</li> </ul>	January 1, 2016	Compliant
<ul style="list-style-type: none"> <li>• File accessibility reports based on stated deadlines in the AODA</li> </ul>	December 31, 2013, 2015, 2017, 2019	Compliant



## Accessibility Achievements Beyond AODA Compliance

In addition to meeting AODA compliance requirements, Osler has also accomplished a number of accessibility achievements. Key achievements since the previous Multi-year Accessibility Plan was approved include the following.

- Established a new email address that is monitored to address all accessibility requests and feedback ([accessiblefeedbacksupport@williamoslerhs.ca](mailto:accessiblefeedbacksupport@williamoslerhs.ca))
- Ensured that the number of designated accessible parking spots is met or exceeded at each Osler facility
- Continue to participate actively at Osler on-site and community events to help raise awareness about Osler accessibility programs and services. Examples of events include local community agency events, Diversity and Accessibility weeks, and Annual Diversity Days organized for staff, volunteers and physicians
- Involved staff in identifying accessibility barriers by inviting representatives to participate in Visioning sessions and providing ongoing opportunities to provide feedback
- Continue to establish and build linkages with community organizations and engage community in planning to increase accessibility and inclusion
- Established a Wayfinding Committee, led by members of the Accessibility Advisory Committee for the development of Peel Memorial Centre. Based on barriers and best practices identified, Osler has improved wayfinding signage and information and also has begun training staff and volunteers to provide clear and effective wayfinding information
- Updated information and procedural kiosks to ensure accessibility
- Developed a fragrance-free policy and raised awareness with staff regarding establishing Osler as a fragrance-free organization
- Working with Ministry of Health and Infrastructure Ontario, Osler completed the design and construction of, and transition to, several new state-of-the-art accessible facilities (Peel Memorial Centre Phase 1 and Etobicoke General Hospital Patient Tower)

## Measures to Identify, Remove, and Prevent Barriers

### Identifying Barriers

To assist with identifying accessibility barriers, Osler uses various methods to gather feedback from Osler staff, patients, and the broader community.

#### Staff Feedback

- Joint Health Safety Committee (JHSC) inspection reports
- Hospital committees and meetings with Clinical Leaders and Managers
- Email communication to Senior Manager, Diversity, Inclusion and Learning; and Accessibility Advisory Committee members via [accessiblefeedbacksupport@williamoslerhs.ca](mailto:accessiblefeedbacksupport@williamoslerhs.ca)

#### Patient Feedback

- Accessibility Feedback Forms
- Patient Care unit managers or staff
- Patient interviews and focus groups
- Communication received through Patient Relations or Service Excellence Call Centre

#### Community Feedback

- Patient Family Advisory Committee to communicate with the Osler Accessibility Advisory Committee as needs and barriers are identified
- Region of Peel's Advisory Committee members and City of Brampton's Accessibility Committee
- Communication received through Osler Patient Relations or Service Excellence Call Centre

### Removing and Preventing Barriers

Beyond meeting AODA compliance requirements, Osler is committed to responding to staff, patient, and community feedback in identifying priorities to increase accessibility and inclusion at Osler, for patients, staff, and the public. Osler staff and the AAC have identified the following goals to remove and prevent accessibility barriers at Osler over the coming years.

#### 2020

- Osler is committed to making all websites and web content accessible by January 1, 2021. This includes ensuring that all Internet websites and web content conform with WCAG 2.0 level AA (excluding live captioning and audio description) s.14, AODA.
- Implement and promote use of new accessibility email address ([accessiblefeedbacksupport@williamoslerhs.ca](mailto:accessiblefeedbacksupport@williamoslerhs.ca)) for staff and public
- Ensure that Osler procurement policies and documents (for example, RFPs) include specific accessibility requirements, where possible

- Continue to improve wayfinding signage and information
- Continue to train staff and volunteers to provide clear and effective wayfinding information
- Update Terms of Reference for AAC
- Review existing accessibility policies and procedures and update, where necessary, including:
  - Accessibility Standards for Customer Service Policy: Providing Goods and Services to Persons with Disabilities. PPR329
  - Accessibility Policy. Corporate. PPR1317
  - Procedure for Accepting Feedback regarding Accessibility at William Osler Health System for Persons with Disabilities. PPR325
  - Procedure for Posting Notice of Temporary Disruption to Facilities and Services Normally Used by Persons with Disabilities. PPR326
  - Procedure for Welcoming Service Animals and Support Persons Accompanying Persons with Disabilities. PPR327
  - Procedure for Training to Customer Service for Persons with Disabilities. PPR328.
  - Accessibility and Emergency Response Procedures Policy. PPR365
  - Patient Experience - Feedback Management. P225

## 2021

- Develop accessible downloadable floor plans and maps or alternate wayfinding and directional content
- Gather staff demographic data to determine representation of people with disabilities and other diverse groups within Osler
- Increase employment and other opportunities for under-represented populations

## Ongoing

- Osler is committed to filing an accessibility report based on stated deadlines in the AODA: December 31, 2021, 2023, and 2025.
- Osler is committed to preparing and posting annual updates describing what has been done to achieve AODA compliance requirements and Osler accessibility goals and achievements described in the multi-year accessibility plan.
- Osler is also committed to making its annual status updates public and providing in an accessible format, upon request.
- Osler is committed to exploring ongoing accessibility awareness and educational opportunities for its physicians and other professional staff.

## Communication of the Plan

The 2019-2024 Multi-year Accessibility Plan (MYAP) will be shared with Osler staff and the broader community. The MYAP will be available on the Osler website at <http://www.williamoslerhs.ca/about-osler/care-quality-and-governance/accessibility-plan> and upon request from the Senior Manager, Diversity, Inclusion & Learning, who will make every effort to provide the document in alternate formats, if requested.

## Contact Us

Senior Manager, Diversity, Inclusion & Learning  
Human Resources, William Osler Health System  
905-494-2120 ext. 29174  
[accessiblefeedbacksupport@williamoslerhs.ca](mailto:accessiblefeedbacksupport@williamoslerhs.ca)  
Peel Memorial Centre  
20 Lynch Street, Brampton, ON L6W 2Z8

## Resources

### General

Accessibility for Ontarians with Disabilities Act, 2005. Government of Ontario online laws. <https://www.ontario.ca/laws/regulation/110191>

OSLER Accessibility Committee Working Group. *Accessibility Audit: Priorities & Recommendations*. February 6, 2017.

Sterling Frazer Associates. *Accessibility Audit, Brampton Civic Hospital*. January, 2017.

OSLER AAC AODA and Accessibility Awareness Survey feedback. November, 2019.

### Osler Accessibility Policies, Procedures, and Related Documents

William Osler Health System. *Multi-year Accessibility Plan. 2013-2018*.

Accessibility Standards for Customer Service Policy: Providing Goods and Services to Persons with Disabilities. PPR329. November 30, 2010. [DRAFT]

Accessibility Policy. Corporate. PPR1317. Dec. 2012. [INTERNAL]

Procedure for Accepting Feedback regarding Accessibility at William Osler Health System for Persons with Disabilities. PPR325. November 30, 2010. [DRAFT]

Procedure for Posting Notice of Temporary Disruption to Facilities and Services Normally Used by Persons with Disabilities. PPR326. November 30, 2010. [DRAFT]

Procedure for Welcoming Service Animals and Support Persons Accompanying Persons with Disabilities. PPR327. November 30, 2010. [DRAFT]

Procedure for Training to Customer Service for Persons with Disabilities. PPR328. November 30, 2010. [DRAFT]

Accessibility and Emergency Response Procedures Policy. PPR365. February 23, 2016. [CURRENT]

Patient Experience - Feedback Management. P225. April 2016.

Accessibility Standards for Customer Service. A staff guide to excellence in serving people including those with disabilities. OSLER eLearning content.